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December 1, 2020

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Exemption from Caller ID Authentication Requirements*, CG Docket No. 20-68

Dear Ms. Dortch:

Pursuant to Section 64.6306(a) of the Commission's rules, 47 C.F.R. § 64.6306(a), Cellco Partnership d/b/a/ Verizon Wireless ("Verizon Wireless") respectfully requests that the Commission issue it an exemption from the requirements of 47 C.F.R. Section 64.6301. In support, Verizon Wireless hereby submits the required certification of compliance with the conditions set forth in §64.6306(a).

Please contact the undersigned should you have any questions.

Sincerely,

/s

Christopher Oatway

Attachments

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
	)	CG Docket No. 20-68
Exemption from Caller ID Authentication	)	
Requirements	)	
	)	

**CERTIFICATION OF CELLCO PARTNERSHIP, D/B/A VERIZON WIRELESS,  
SUPPORTING ITS REQUEST FOR A VOLUNTARY EXEMPTION UNDER  
47 C.F.R. 64.6306(a)**

1. I, \_\_\_\_\_Ed Chan\_\_\_\_\_, hereby certify that I am an officer of Cellco Partnership, d/b/a Verizon Wireless (“Verizon Wireless”). I further certify, based on my personal knowledge, that the statements and information contained in this certification and in the accompanying statement are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with Verizon Wireless subject-matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. I certify that Verizon Wireless meets the criteria the Commission has established for an exemption for internet Protocol networks pursuant to Section 4(b)(2) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019) (TRACED Act). Accompanying this certificate is a statement explaining in detail how Verizon Wireless satisfies each prong of the applicable exemption.
3. Pursuant to 47 C.F.R. § 1.16, I certify under penalty of perjury that the foregoing is true and correct.



Signature



Print Name



Date

**STATEMENT OF VERIZON WIRELESS ACCOMPANYING ITS CERTIFICATION  
AND REQUEST FOR A VOLUNTARY EXEMPTION UNDER 47 C.F.R. 64.6306(a)**

Under Section 4(b)(2) of the TRACED Act and 47 C.F.R. § 64.6306(a) of the Commission’s rules, Verizon Wireless hereby requests that the Commission issue it a “voluntary STIR/SHAKEN implementation exemption” based on its having implemented STIR/SHAKEN more than two years before the mandatory STIR/SHAKEN deadline.<sup>1</sup> As the Commission requires, Verizon Wireless has, “for those portions of its network served by technology that allows for the transmission of SIP calls,” met each of the following four requirements for an exemption under § 64.6306(a):

**Subpart (1): “[H]as adopted the STIR/SHAKEN authentication framework for calls on the Internet Protocol networks of the voice service provider, by completing the network preparations necessary to deploy the STIR/SHAKEN protocols on its network including but not limited to participation in test beds and lab testing, or completion of commensurate network adjustments to enable the authentication and validation of calls on its network consistent with the STIR/SHAKEN framework.”**

All of Verizon Wireless’s traffic has been STIR/SHAKEN-enabled since March 2019. Verizon Wireless began signing and verifying all on-net traffic that month and began signing and verifying traffic externally in August 2019 after completing its first interconnection upgrade with a carrier partner (see details below). Because Verizon Wireless’s implementation pre-dated the emergence of a formal governance regime for STIR/SHAKEN certificates, we initially

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<sup>1</sup> This certification and exemption request are submitted for Cellco Partnership, d/b/a Verizon Wireless, which accounts for over 95% of Verizon’s total consumer traffic. Verizon intends and expects to comply with the STIR/SHAKEN mandate for all of its wireline VoIP operations. However, out of an abundance of caution, its wireline business units are not certifying because of some ambiguity in the application of Section 64.6306(a). For example, it is not clear how the certification process intersects with Verizon’s request for a declaratory ruling confirming that the STIR/SHAKEN mandate does not reach a POTS service provided over a fiber platform. *See* Verizon Petition of Verizon for Declaratory Ruling or, In the Alternative, A Limited Extension of the STIR/SHAKEN Implementation Deadline, Docket No. 17-97 (Nov. 20, 2020).

implemented inter-carrier STIR/SHAKEN by manually exchanging certificates with other early adopters. Verizon Wireless completed all of the necessary pre-implementation steps (e.g., completing “network adjustments”) prior to going into production with STIR/SHAKEN in March 2019.

The Policy Administrator (PA), the entity that verifies, confirms, manages, and supports the issuance of digital certificates for use in the SHAKEN framework, was created in December 2019. That month Verizon completed initial lab testing with the PA, and subsequently has undergone additional testing as the PA has introduced more sophisticated Application Programming Interfaces.

**Subpart (2): “[H]as agreed voluntarily to participate with other voice service providers in the STIR/SHAKEN authentication framework, as demonstrated by completing formal registration (including payment) and testing with the STI Policy Administrator.**

In late 2019, Verizon registered with the STI Policy Administrator. As part of the process of registering, Verizon Wireless (as well as Verizon’s wireline affiliates) successfully underwent testing with the Policy Administrator.

Verizon not only paid for its certificate but also agreed to jumpstart the STIR/SHAKEN ecosystem by subsidizing the entire STIR/SHAKEN regime in 2020. Given the hesitancy of many other companies to register and begin implementing STIR/SHAKEN, Verizon and three other early adopters of STIR/SHAKEN agreed to cover all of the Policy Administrator’s 2020 costs that are not covered by other companies’ purchases of certificates. Verizon thereby ensured that the vendor awarded the PA contract would be fully compensated for its investment, even as many other service providers chose (and continue) to hold off on registering in order to defer registration costs until 2021.

**Subpart (3): “[H]as begun to implement the STIR/SHAKEN authentication framework by completing the necessary network upgrades to at least one network element—e.g., a single switch or session border controller—to enable the authentication and verification of caller identification information consistent with the STIR/SHAKEN standards.**

Verizon Wireless has engaged and continues to engage in significant nationwide project management activities to enable STIR/SHAKEN with each of the service providers with which it directly exchanges traffic via direct interconnects and exchange points (e.g., session border controllers). That work is complete with respect to multiple interconnections with multiple providers. Specifically, Verizon Wireless’s interconnections points with four service providers are now upgraded to pass the STIR/SHAKEN headers. Work is ongoing with several more service providers. Those ongoing projects – while necessarily subject to some uncertainty given the dependency on third parties – are proceeding on pace to achieve 100% completion in advance of the June 2021 deadline.

**Subpart (4): [W]ill be capable of fully implementing the STIR/SHAKEN authentication framework not later than June 30, 2021, which it may only determine if it reasonably foresees that it will have completed all necessary network upgrades to its network infrastructure to enable the authentication and verification of caller identification information for all SIP calls exchanged with STIR/SHAKEN-enabled partners by June 30, 2021.**

As described above, Verizon Wireless has already completed all necessary upgrades to its network infrastructure to enable the authentication and verification of STIR/SHAKEN for all SIP calls exchanged with other service providers. Indeed, since beginning to send STIR/SHAKEN-enabled calls over interconnections with other service providers in mid-2019, Verizon Wireless has externally signed over 18 billion calls in addition to those that stay on its own network.